

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

PRESIDENT DONALD J. TRUMP,
45th President of the United States of
America, in his individual capacity,

Plaintiff,

v.

SIMON & SCHUSTER, INC., a New
York corporation, ROBERT
WOODWARD p.k.a. BOB
WOODWARD, an individual, and
PARAMOUNT GLOBAL, a Delaware
corporation f/k/a VIACOMCBS, INC.,
a Delaware corporation, f/k/a Viacom
Inc., successor by merger to
CBS Corporation, a Pennsylvania
corporation f/k/a Westinghouse Electric
Corporation,

Defendants.

Civil Action Number:
3:23-cv-02333-MCR-ZCB

**MOTION FOR ADMISSION
*PRO HAC VICE***

Pursuant to Local Rule 11.1(C), Defendant Bob Woodward moves for the admission *pro hac vice* of Thomas G. Hentoff, a licensed member of the District of Columbia Bar. Mr. Hentoff has undertaken the representation of Defendant Bob Woodward as Of Counsel. Davis Wright Tremaine LLP and Gunster, Yoakley & Stewart, P.A. remain as Counsel for all Defendants, including Woodward. In support of this motion, Defendant states as follows:

1. Thomas G. Hentoff resides in Washington, DC.

2. Mr. Hentoff is licensed to practice law in Washington, DC and Pennsylvania, and is a member in good standing of the District of Columbia and Pennsylvania Bars. A true and correct copy of Mr. Hentoff's Certificate of Good Standing from the District of Columbia Court of Appeals is attached hereto as Exhibit A.

3. Mr. Hentoff is a Partner at the law firm Williams & Connolly LLP, 680 Maine Avenue, SW, Washington, DC 20024.

4. Williams & Connolly LLP was retained by Defendant Bob Woodward to provide legal representation in connection with the above-captioned action before this Court. Should the Court grant this motion, Mr. Hentoff and Williams & Connolly LLP will represent Defendant Bob Woodward as Of Counsel in this case, with Davis Wright Tremaine, 1251 Avenue of the Americas, 21st Floor, New York, NY 10020, and Gunster, Yoakley & Stewart, P.A., One Independent Dr., Suite 2300, Jacksonville, FL 32202, remaining as Counsel to Mr. Woodward.

5. Mr. Hentoff is not a member of The Florida Bar and does not maintain any law office in Florida.

6. Mr. Hentoff studied and is familiar with the Local Rules of this District. He further certifies he successfully completed the Attorney Admission Tutorial for the Northern District of Florida and has reviewed the CM/ECF Attorney User's Guide. (Confirmation #: 16319-HT-751A5522.)

7. Mr. Hentoff agrees to comply with the provisions of the Florida Rules of Professional Conduct, the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Federal Rules of Appellate Procedure, and the Local Rules of this Court and understands he shall be subject to the disciplinary jurisdiction of this Court.

8. Mr. Hentoff certifies that he has never been subject to any suspension or disbarment proceedings.

9. Mr. Hentoff has an active, upgraded PACER account. He requests authorization to receive electronic notices of filing, if he is not already eligible by virtue of his November 15, 2016 registration in an unrelated case. His email address is thentoff@wc.com.

10. Mr. Hentoff is paying the required \$208.00 *pro hac vice* fee for this case at the time of filing.

WHEREFORE, Defendant Bob Woodward respectfully requests that this Court enter an order granting this motion and permitting Mr. Hentoff to appear *pro hac vice* in this case.

/s/ Thomas G. Hentoff

Thomas G. Hentoff

District of Columbia Bar No. 438394

WILLIAMS & CONNOLLY LLP

680 Maine Avenue, SW

Washington, DC 20024

Tel: (202) 434-5000

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thentoff@wc.com

Of Counsel for Defendant Bob Woodward

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2023, I electronically filed the forgoing with the Clerk of Court by using CM/ECF, which automatically serves all counsel of record for the parties who have appeared.

/s/ Thomas G. Hentoff

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